

# EXHIBIT J

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, <i>Co-Chair</i> (1944-2013) MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Elliot R. Feldman, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Paul J. Hanly, Jr., <i>Co-Liaison Counsel</i> SIMMONS HANLY CONROY LLP	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA EMAIL**

May 6, 2016

Steven T. Cottreau, Esq.  
Clifford Chance US LLP  
2001 K Street, N.W.  
Washington, DC 20006

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Steve:

I write on behalf of the Plaintiffs' Executive Committees in response to your April 13, 2016 letter addressing the discovery orders issued by Magistrate Judge Frank Maas at the conference held on March 22, 2016. During that hearing, Judge Maas directed Dubai Islamic Bank ("DIB") to respond to plaintiffs' various requests for documents and information, including documentation relating to "investigations or other responses that the bank internally may have had in terms of checking whether it had troublesome accounts or relationships" relative to the 1998 bombings of the United States embassies in Dar es Salaam, Tanzania and Nairobi, Kenya; the identification of all members of DIB's Fatwa and Sharia Supervisory Board from January 1, 1992 through December 31, 2004; and the unredacted version of the U.A.E. Central Bank circular, dated July 6, 2003, identifying the 152 individuals and one entity "belonging to/or associated with the Taliban." Plaintiffs are in receipt of the Central Bank circular attached to your April 13 letter (DIB003558-3582).

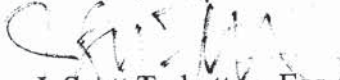
Given the importance of the aforementioned categories of information, and their relevance to the proposed list of 500 individuals to be queried in DIB's electronic legacy account database, we believe the most efficient course of action is to defer the exchange of the list of individuals until after DIB has completed its searches for responsive documentation relating to the U.S. embassy bombings and associated issues, and produced those materials to the plaintiffs. Those responsive records will almost certainly inform the composition of the plaintiffs' list.

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We trust that your client has been actively looking for those records since the March 22 conference. At your earliest convenience, please let us know when plaintiffs may expect to receive those documents from you, and we can then work out an agreeable timeframe to exchange the list of 500 individuals.

Sincerely,



J. Scott Tarbutton, Esq.

THE MDL 1570 PLAINTIFFS' EXECUTIVE  
COMMITTEES

JST

cc: Members of Plaintiffs' Executive Committees (via E-Mail)

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